

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

KERRIE BORBOA, ET AL.,)
v.)
Plaintiffs,) Case No. 3:13-cv-844-JAG
THEODORE L. CHANDLER, ET AL.,)
Defendants.)

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS, AND
FINAL APPROVAL OF PLAN OF ALLOCATION**

Plaintiffs Kerrie Borboa, Timothy O’Grady and Bertrand Francis (collectively the “Named Plaintiffs”), participants in the LandAmerica Financial Group Employee Savings and Stock Ownership Plan (the “Plan”), respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order granting:

1. Final approval of the Settlement in the Action on the terms of the Settlement Agreement (“Settlement Agreement”), filed with this Court on March 12, 2015 (Docket No. 71-1)¹;
2. Final certification of the Settlement Class, including appointment of KTMC as Class Counsel and the Named Plaintiffs as class representatives; and
3. Final approval of the proposed Plan of Allocation.

The grounds for this Unopposed Motion are set forth in the following papers filed contemporaneously herewith:

¹ All Capitalized terms not defined herein are defined in the Settlement Agreement.

A. Plaintiffs' Memorandum of Law in Support of Unopposed Motion for Final Approval of Class Action Settlement, Certification of the Settlement Class, and Final Approval of Plan of Allocation; and

B. Declaration of Mark K. Gyandoh in Support of Plaintiffs' Unopposed Motions for Final Approval of Class Action Settlement, Certification of Settlement Class, and Final Approval of Plan of Allocation and for an Award of Attorneys' Fees, Reimbursement of Expenses and Case Contribution Awards to the Named Plaintiffs, and exhibits thereto.

Attached hereto as Exhibits A and B, respectively, are the proposed Final Approval Order and Judgment and the proposed Plan of Allocation, as agreed to by the Parties.

DATED: June 19, 2015

Respectfully submitted,

s/ Charles L. Williams
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CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2015, I electronically filed the foregoing Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement, Certification of Settlement Class, and Final Approval of Plan of Allocation with the Clerk of Court via the CM/ECF system, which will deliver notification of filing to all counsel of record

/s/ Charles L. Williams
Charles L. Williams